

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
MIDLAND-ODESSA DIVISION**

DANIELLE SPEARS,
Plaintiff,

v.

NEXT BRIDGE HYDROCARBONS, INC.,
GREGORY McCABE, JOHN BRDA,
ROGER N. WURTELE, KENNETH RICE,
JOSEPH DeWOODY, CLIFTON DUBOSE
AND JANE DOE 1/20, JOHN DO 1-20
Defendants.

§
§
§
§
§
§
§
§
§
§
§

Case No. 7:24-CV-321-DC

**DEFENDANT, NEXT BRIDGE HYDROCARBONS, INC.’S UNOPPOSED MOTION TO
EXTEND PLEADINGS DEADLINE**

TO THE HONORABLE JUDGE OF SAID COURT:

NOW COMES, NEXT BRIDGE HYDROCARBONS, INC., (hereinafter “NBH”), one of the Defendants herein and files this motion seeking an extension of its deadline to answer or otherwise respond to Plaintiff’s Second Amended Complaint and would respectfully show the Court as follows:

1. Defendant NBH’s deadline to respond to Plaintiff’s Second Amended Complaint is May 12, 2025. The Second Amended Complaint spans over 80 pages and over 250 paragraphs, names dozens of defendants, and purports to allege eight causes of action in addition to declaratory relief and injunctive relief.
2. Defendant NBH anticipates counsel of record for NBH to be withdrawn from the case, and has hired the undersigned, which are working on responsive pleadings and getting up to speed on this case.

3. Defendant McCabe has also recently obtained substituted counsel, and this Court granted his opposed extension of his response deadline to June 16, 2025, and found it reasonable. (Doc. 33).
4. Accordingly, NBH respectfully requests that the Court extend its deadline to answer or otherwise respond to Plaintiff's Second Amended Complaint to June 16, 2025.
5. This is NBH's second request for an extension of time. This extension is not sought for purposes of delay, but so that justice may be done.
6. Undersigned counsel conferred with pro se Plaintiff via electronic mail on or about May 7, 2025, and Plaintiff indicated that she is not opposed to the motion or relief requested.

Dated: May 8, 2025

Respectfully submitted,

/s/ J. Paul Manning

J. PAUL MANNING

State Bar No. 24002521

jpmanning@lubbocklawfirm.com

Joshua D. Frost

State Bar No. 24097711

jfrost@lubbocklawfirm.com

FIELD MANNING STONE AYCOCK P.C.

2112 Indiana Avenue

Lubbock, Texas 79410-1499

806/792-0810 (Telephone)

806/792-9148 (Facsimile)

ATTORNEYS FOR DEFENDANT **NEXT BRIDGE
HYDROCARBONS, INC.**

CERTIFICATE OF CONFERENCE

Pursuant to the Local Civil Rule CV-7(G), the undersigned hereby certifies that, as counsel for Defendant NBH, his office has conferred with Plaintiff Danielle Spears via email on May 7, 2025, and that Plaintiff is unopposed to the motion and relief requested.

/s/ J.Paul Manning

J.Paul Manning

CERTIFICATE OF SERVICE

I certify that I served the foregoing document on all counsel of record via the Court's CM/ECF system on May 8, 2025.

/s/ J.Paul Manning

J.Paul Manning